

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Miami Division

JANE DOE,

Case No: 1:25-cv-20757-JB/Torres

Plaintiff,

vs.

STEVEN K. BONNELL II,

Defendant.

_____ /

**[PROPOSED] PROTECTIVE ORDER GOVERNING PUBLIC
COMMENTARY BY TRIAL PARTICIPANTS**

This matter is before the Court on Plaintiff Jane Doe’s Motion for Protective Order Governing Public Commentary By Trial Participants (“Motion”)(Dkt. No. ____). The Court has considered the record, as well as the facts and arguments in support of the Motion, and finding good cause shown, pursuant to Federal Rule of Civil Procedure 26(c), Local Rule 77.2 and the Court's inherent authority to control the proceedings and ensure the fair administration of justice, the Court grants the Motion and enters this Protective Order (“Order”) to limit public commentary by trial participants, including the parties and their counsel. The nature of the claims involves the non-consensual dissemination of intimate images and related personal matters, requiring heightened protection of the parties’ and non-parties’ privacy. There is good cause to enter this Order to protect the parties and non-party witnesses from annoyance, embarrassment, oppression, harassment or retaliation due to the disclosure of confidential and sensitive information produced during discovery.

Accordingly, it is ORDERED and ADJUDGED that the Motion is GRANTED and the following Protective Order is entered, as follows:

1. Purpose

This Order is intended to preserve the integrity of the judicial process, protect the safety and privacy of the parties, witnesses, and their counsel, and prevent intimidation, harassment, or undue prejudice arising from extrajudicial statements.

2. Scope

This Order applies to all trial participants, including parties, attorneys, representatives, consultants, agents, witnesses, and any individual acting in concert with or under the direction of the parties or their counsel.

3. Prohibited Conduct

No person covered by this Order shall make or cause to be made any public statement — including on livestreams, podcasts, social media platforms, blogs, or to the press — that:

- Disparages, harasses, threatens, or intimidates the parties, witnesses, potential witnesses, or either party's counsel;
- Publicizes or repeats any sensitive personal allegations or private details underlying the claims in this action;
- Publicizes or repeats any confidential settlement discussions or communications which are protected under Fed. R. Civ. P. 408, or any meet and confer communications between counsel;
- Publicly identifies the Plaintiff or witnesses whose declarations have been filed under seal, or speculates about the identity of witnesses or potential witnesses, particularly in derogatory, demeaning, or inflammatory terms;

- Misrepresents or mischaracterizes the content of legal filings, discovery, court orders, or the positions of any party or attorney in this litigation.

4. No Impact on Legal Advocacy

Nothing in this Order restricts the right of any party or counsel to argue their case in court or in legal filings, or to comply with legal obligations to report or disclose information to regulatory or law enforcement authorities.

5. Enforcement

Any violation of this Order may result in sanctions including monetary sanctions, contempt proceedings, evidentiary sanctions, or any other relief deemed appropriate by the Court.

6. Duration

This Order shall remain in effect through the conclusion of trial and post-trial proceedings unless modified by further order of the Court.

DONE AND ORDERED in Miami, Florida on _____, 2025.

JACQUELINE BECERRA
UNITED STATES DISTRICT JUDGE